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March 7, 2003

Marlene H. Dortch, Secretary
Federal Communications Commission
Washington, D.C. 20554

Re: Ex parte communication,
CC Docket No. 99-200; CC Docket No. 95-116; WT Docket No. 01-184:
Petitions for extension of the deadline for support of roaming by wireless
end users with ported or pooled numbers

Dear Ms. Dortch:

This responds to the Comments of Mid-Missouri Cellular ("MMC") filed February 13, 2003 in the referenced proceeding. Like MMC, the National Emergency Number Association ("NENA") takes no position at this time on the merits of the subject petitions. Instead, we wish to correct MMC's impression (Comments, 3-4) that a wireless carrier's inability to support Mobile Identification Number/Mobile Directory Number ("MIN/MDN") separation excuses the carrier from supplying a means to call back a wireless caller to 9-1-1.

To the contrary, the FCC has cautioned:

We note that carriers choosing not to implement the industry selected MIN/MDN separation solution are not excused from their obligation to deliver valid call back numbers to Public Safety Answering Points (PSAPs), in accordance with the Commission's enhanced 911 (E911) rules. See 47 C.F.R. § 20.18(d).¹

Accordingly, Petitioners correctly sought (Petition, 4, n.10) the 9-1-1 rule waiver.

¹ Memorandum Opinion and Order, FCC 02-215, released July 26, 2002, 15, n.118.

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Please direct any questions to the undersigned.

Sincerely,

James R. Hobson

cc: Counsel for MMC; counsel for Petitioners